

1 Stephen E. Baumann II (*pro hac vice* pending)<sup>1</sup>  
stephen.baumann@hklaw.com  
2 Hannah J. Fitzgerald (*pro hac vice* pending)  
hannah.fitzgerald@hklaw.com  
3 HOLLAND & KNIGHT LLP  
1801 California St., Ste. 5000  
4 Denver, CO 80202  
Tel: 303.974.6660  
5 Fax: 303.974.6659

6 Anjuli B. Woods  
Nevada Bar No. 10989  
7 awoods@wwhgd.com  
8 WEINBERG WHEELER HUDGINS GUNN & DIAL  
6385 S. Rainbow Blvd., Ste. 400  
9 Las Vegas, NV 89118  
Tel: 702.938.3810  
10 Fax: 702.938.3846

11 *Attorneys for Defendant Byrncut US Corporation*

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13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

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16 GERMAN BARAJAS, an individual,  
17 Plaintiff,  
18 vs.  
19 BYRNECUT US CORPORATION, a  
Nevada corporation,  
20 Defendant.  
21

Case No.: 2:25-CV-00473-RFB-MDC

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
BYRNECUT US CORPORATION TO  
FILE RESPONSIVE PLEADING TO  
COMPLAINT**

**(SECOND REQUEST)**

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<sup>1</sup> Counsel has complied with LR IA 11-2 and moved for *pro hac vice* admission.

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Pursuant to Local Rules 6-1 and 6-2, Plaintiff German Barajas (“Plaintiff”) and Defendant Byrncut US Corporation (“Byrncut” and together with Plaintiff, the “Parties”) stipulate and agree as follows:

**WHEREAS:**

1. On or about April 3, 2025, Byrncut was served with the Summons and Complaint for the above-referenced matter. [ECF No. 6].

2. On April 17, 2025, counsel for Byrncut conferred with Plaintiff’s counsel to request that the Parties agree to extend Byrncut’s deadline to file a responsive pleading while it continues to gather further information regarding Plaintiff’s claims and obtains resident counsel per the local rules. The Parties agreed that good cause existed to extend Byrncut’s responsive pleading deadline to May 15, 2025.

3. The Court granted the stipulation on April 30, 2025. [ECF No. 10].

4. Byrncut has now obtained resident counsel, as Anjuli B. Woods now works for Weinberg Wheeler Hudgins Gunn & Dial in its Las Vegas, Nevada office.

5. On or about May 14, 2025, counsel for Byrncut conferred with Plaintiff’s counsel to request that the Parties agree to briefly extend Byrncut’s deadline to file a responsive pleading by seven days, as Byrncut’s resident counsel transitioned to a new firm, and counsel is finalizing its response to Plaintiff’s Complaint.

6. The Parties agreed that good cause exists to briefly extend Byrncut’s responsive pleading deadline to May 22, 2025.

7. This stipulation is made in good faith and not for the purpose of delay.

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8. This is the second stipulated request to extend Byrncut's responsive pleading deadline.

**NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

Byrncut's time to file a responsive pleading to Plaintiff's Complaint is extended. Bryncut shall file its responsive pleading on or before May 22, 2025.

DATED this 14th day of May, 2025.

GREENBERG GROSS LLP

HOLLAND & KNIGHT LLP

By: /s/ Michael A. Burnette  
JEMMA E. DUNN  
Nevada Bar No. 16229  
MATTHEW T. HALE  
Nevada Bar No. 16880  
MICHAEL A. BURNETTE  
Nevada Bar No. 16210  
1980 Festival Plaza Dr., Ste. 730  
Las Vegas, NV 89135

*Attorneys for Plaintiff German  
Barajas*

By: /s/ Anjuli B. Woods  
Anjuli B. Woods  
Nevada Bar No. 10989  
WEINBERG WHEELER  
HUDGINS GUNN & DIAL  
6385 S. Rainbow Blvd., Ste. 400  
Las Vegas, NV 89118

Stephen E. Baumann II  
(*pro hac vice* pending)  
Hannah J. Fitzgerald  
(*pro hac vice* pending)  
1800 California St., Ste. 5000  
Denver, Colorado 80202

*Attorneys for Defendant Byrncut  
US Corporation*

**IT IS SO ORDERED:**

  
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Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge

DATED: 5/15/2025